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Attorneys for the Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

“JENNY,” “CARRIE,” “LILY,” “SARAH,”
“HENLEY,” “MAUREEN” and “JANE
ROE” as next friend for “PIA,”

Plaintiffs,

v.

THOMAS BLAHA,

Defendant.

Case No: 2:23-cv-07051-HG

DECLARATION OF JAMES R. MARSH
IN SUPPORT OF MOTION TO PROCEED
UNDER PSEUDONYMS

**DECLARATION OF JAMES R. MARSH IN SUPPORT OF MOTION TO PROCEED
UNDER PSEUDONYMS**

I, JAMES R. MARSH, declare under penalty of perjury that the following is true and correct under the laws of the State of New York and under 28 USC §1746.

I represent Plaintiffs Jenny and Carrie. I am making this declaration based upon my own personal knowledge and professional experience as an attorney in support of the Plaintiffs’ motion to proceed using pseudonyms.

DECLARATION OF JAMES R. MARSH IN SUPPORT OF
PLAINTIFFS’ MOTION TO PROCEED UNDER PSEUDONYMS - 1

1. In 2005, I began representing victims of child pornography and online exploitation. I have represented such victims in both criminal and civil cases at all levels of the federal court system including the United States Supreme Court. I have also helped enact major law reform in Congress to enhance the ability of victims to obtain compensation in civil and criminal cases.

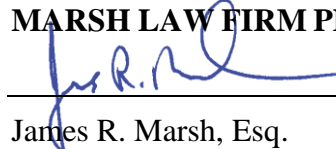
2. I have represented Plaintiff Jenny since 2016 and Plaintiff Carrie since 2021. I have represented Carrie and Jenny in both criminal and civil matters related to their victimization through child pornography. In each of these matters, a pseudonym has been used in order to protect their anonymity. No court has ordered that they proceed with their legal name in any court proceeding.

3. Carrie and Jenny request permission to use pseudonyms herein in order to protect them from harassment, injury, ridicule and personal embarrassment.

4. Carrie and Jenny have suffered and continue to suffer from grievous psychological harm resulting from the child pornography related crimes of which they are victims. They suffer from anxiety, depression, post-traumatic stress disorder, and hyper-vigilance. They live in daily fear that someone will discover their identity and link them to the child sexual abuse images of them on the Internet. They believe, as do I, that exposing their legal names to the public will put them in significant physical and emotional danger.

DATED this 22nd day of September 2023.

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